

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JOHNSON,)	
)	No.: 07CV7288
Plaintiff,)	
)	
)	Judge Aspen
v.)	Magistrate Judge Keys
)	
JACKSON, et al.)	
)	
Defendants.)	
)	

**AGREED MOTION OF DEFENDANTS AMARU ENTERTAINMENT, INC. AND
AFENI SHAKUR (AS THE CO-ADMINISTRATOR OF THE TUPAC SHAKUR
ESTATE) FOR EXTENSION OF TIME TO FILE AN ANSWER OR OTHERWISE
PLEAD TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants Amaru Entertainment, Inc. and Afeni Shakur (as the co-administrator of the Tupac Shakur Estate), (collectively "Defendants"), by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b), hereby respectfully request that this Court extend Defendants' time to answer or otherwise plead to Plaintiff's First Amended Complaint by fourteen (14) days, giving Defendants up to and including May 15, 2008 to answer or otherwise plead. Plaintiff's counsel has advised that there is no objection to this motion. In support of their Motion, the Defendants state:

1. At the March 4, 2008 status conference, this Court entered an order granting Plaintiff leave to file an amended complaint by April 1, 2008. Defendants were to answer or otherwise plead by May 1, 2008.
2. On April 1, 2008, Plaintiff filed his First Amended Complaint.
3. Eric Farber of Pinnacle Law Group LLP will be seeking *pro hac vice* admission to this Court as lead counsel in this case. Mr. Farber requires some further time to become acquainted with the facts and issues involved in the matter. Mr. Farber's *pro hac vice*

application will be filed with this Court as soon as possible.

4. On April 30, 2008, Defendants' counsel contacted Plaintiff's counsel to inform her of this development and to request further time to answer or otherwise plead. Plaintiff's counsel has confirmed that there is no objection to this motion.

5. Defendants bring this Motion in good faith, and do not believe that an extension of time as set forth above will cause an undue delay to these proceedings.

6. Defendants therefore request that this Court grant an extension so Defendants have up to and including May 15, 2008 to file their answers or otherwise plead to Plaintiff's First Amended Complaint.

WHEREFORE, Defendants respectfully request that this Court enter an order allowing Defendants Amaru Entertainment, Inc. and Afeni Shakur (as the co-administrator of the Tupac Shakur Estate) up to and including May 15, 2008 to file their answers or otherwise plead to Plaintiff's First Amended Complaint.

Dated: May 1, 2008

Respectfully submitted by,

/s/ David R. Geerdes

One of the attorneys for Defendants Afeni Shakur (as the Co-Administrator of the Tupac Shakur Estate) and Amaru Entertainment, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2008 I electronically filed the foregoing AGREED MOTION OF DEFENDANTS AMARU ENTERTAINMENT, INC. AND AFENI SHAKUR (AS THE CO-ADMINISTRATOR OF THE TUPAC SHAKUR ESTATE) FOR EXTENSION OF TIME TO FILE AN ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED COMPLAINT with the Clerk of the Court using the CM/ECF system which will send notification of such filing to registered parties.

/s/ David R. Geerdes
One of the attorneys for Defendants Afeni Shakur (as the Co-Administrator of the Tupac Shakur Estate) and Amaru Entertainment, Inc.